



# Region 4 - Air Planning Agreement For Fiscal Year 2016 \*\* Final \*\*

## End of Year Review Phase

**Agency: Memphis-Shelby County Health Department**  
**View Portions of the Workplan**

### Improving Air Quality\*

#### **Goal: 1: Addressing Climate Change and Improving Air Quality**

**Objective: 1.2: Improve Air Quality.** Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

#### **Sub-Objective: Reduce Criteria Pollutants and Regional Haze**

#### **Strategic Targets:**

- By 2018, the population-weighted average concentrations of ozone (smog) in all monitored counties will decrease to 0.072 ppm compared to the average of 0.076 ppm in 2011, a reduction of 5 percent.
- By 2018, the population-weighted average concentrations of inhalable fine particles in all monitored counties will decrease to 9.5  $\mu\text{g}/\text{m}^3$  compared to the average of 10.4  $\mu\text{g}/\text{m}^3$  in 2011, a reduction of 9 percent.
- Through 2018, maintain emissions of sulfur dioxide (SO<sub>2</sub>) from electric power generation sources to 5.0 million tons per year compared to the 2009 level of 5.7 million tons emitted. (In 2011, these sources emitted 4.5 million tons.)
- By 2018, visibility in scenic parks and wilderness areas will improve by 15 percent in the East and 5 percent in the West, on the 20 percent worst visibility days, as compared to visibility on the 20 percent worst days during the 2000-2004 baseline.
- By 2018, with EPA support including training, policy, and administrative and technical assistance, tribes will receive 15 additional approvals to implement the Clean Air Act in Indian country (as demonstrated by successful completion of an eligibility determination under the Tribal Authority Rule). The cumulative total will be 62 approved eligibility determinations, from the 2012 baseline of 47.
- 

\* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

#### **FY 2016 105 Grant Commitments:**

##### **Implement the 2008 8-hour Ozone NAAQS**

1. For areas designated nonattainment for the 2008 8-hour ozone NAAQS, meet CAA requirements consistent with the CAA for emissions inventory and emissions statements.

Response: Yes. Will work toward completing redesignation request and maintenance plan.

Last EPA Reviewer: afebresm - 14:16:44 on 02/03/17 - dakers - dakers

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **NAAQS Cross Cutting**

2. Continue to develop and implement standards, plans, strategies, and actions to preserve air quality in attainment areas and prevent further degradation in areas with the potential to be designated nonattainment in the future. Continue screening of monitoring data for early indication of nonattainment. For areas that violate after the designation, work with Region 4 to develop a plan to expeditiously bring each area back into attainment.

Response: Yes.

Last EPA Reviewer: afebresm - 14:16:54 on 02/03/17 - dakers - dakers

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

3. Consistent with the national allocation of section 105 grant resources and the states' and locals' voluntary withholding of 105 grant resources for special projects, continue developing regional planning capabilities for National Ambient Air Quality Standards (NAAQS) and regional haze, including emission inventory development, building air quality modeling capacity, other technical analyses and collaboration with other agencies. The state and local contact or section chief in the Air Regulatory Management Section should be notified, at the mid-year point and a month prior to the end of the grant period, via e-mail of how the state or local agency is meeting this grant condition, specifying applicable specific grants or programs.

Response: Yes.

Last EPA Reviewer: dsmith - 12:19:55 on 02/13/17 - dakers - dakers

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **Implement Mobile Source Programs**

4. Actively participate in the transportation conformity process, which includes the following activities: consult with appropriate transportation and air quality partners on development of motor vehicle emissions budgets; participate in the interagency consultation process; and develop relationships with transportation partners.

Response: Yes. Will continue to work with MPO and attend MPO meetings.

Last EPA Reviewer: dsmith - 12:20:22 on 02/13/17 - dsmith - dsmith

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **Implement NSR Programs**

5. Issue major NSR/Prevention of Significant Deterioration (PSD) permits and minor source permits that comply with CAA requirements and enter Best Achievable Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) determinations for major sources in the Reasonably Achievable Control Technology (RACT)/BACT/LAER Clearinghouse (RBLC).

Response: Will issue the permits as appropriate.

Last EPA Reviewer: lshepa03 - 14:15:29 on 02/13/17 - eland - eland

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

6. Upon receipt of an NSR/PSD permit application for a major source, submit a copy to EPA. If your agency has a completeness determination process, notify EPA when each NSR/PSD permit application is deemed complete. Upon public notice of a draft NSR/PSD permit for a major new source of modification, submit a copy to EPA of any documents relevant to the preliminary determination and draft NSR/PSD permit. Upon issuance of a final major source permit, submit a copy to EPA of any documents relevant to the final determination and final permit.

Response: Will submit NSR/PSD permits to EPA and follow the guidelines.

Last EPA Reviewer: lshepa03 - 14:15:40 on 02/13/17 - eland - eland

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **Ambient Air Monitoring**

7. Operate all criteria pollutant monitors and perform requisite data review and quality assurance/quality control elements in compliance with the requirements of the CFR and other applicable federal policy and guidance. This commitment includes all reporting and data certification requirements (e.g., annual State and Local Air Monitoring Station (SLAMS) reports and data certifications due by May 1 each year). The agency will collect strip chart data or its electronic equivalent for quality assurance purposes. Electronic strip chart data must be collected on a 1 minute timeframe or less. This data must be retained for a minimum of three (3) complete monitoring years.

Response: Will monitor data as described above.

Last EPA Reviewer: swaterso - 13:01:06 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

8. The State will develop and submit for approval a statewide ambient monitoring network plan. The network plan should be consistent with requirements outlined in 40 CFR Parts 50, 53, and 58. Local agencies will coordinate with the State in the development of this plan. The annual network plan is to be submitted on or by July 1 of each year incorporating any changes, real or proposed. Include in the annual ambient monitoring network design plan a certified evaluation of the agency's ambient monitors and auxiliary support equipment and categorize the condition of the equipment as "Good," "Fair," or "Poor." Please indicate which equipment pieces are not in everyday use (e.g., spare/back-up equipment stored in a lab or warehouse.) Auxiliary equipment includes items such as calibrators, data loggers, meteorological equipment, modems, etc. The agency is requested to replace equipment categorized as "Poor."

Response: Will submit plans and replace equipment as described above.

Last EPA Reviewer: swaterso - 13:01:16 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

9. Maintain an approved Quality Management Plan (QMP) for activities involving the collection and use of air quality environmental data. Locals must coordinate with the State. The QMP will be submitted at least 60 days prior to the expiration of the current QMP and address EPA Requirements for Quality Management Plans (EPA QA/R-2, <http://www.epa.gov/quality/qs-docs/r2-final.pdf>). For additional information and guidance see <http://www.epa.gov/quality/qmps.html>.

Response: Will coordinate with the State of TN as described above.

Last EPA Reviewer: rguillot - 18:17:59 on 02/10/17 - rguillot - rguillot

Negotiation Status: Status\_OK

Negotiation Comments: As a separate PQAQ, the Health Department should develop its own QMP.

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff

Response:

10. State and local agencies will review and update their quality assurance project plans (QAPPs) for their respective criteria pollutant networks, as appropriate, and submit modifications to EPA prior to modifying their networks. All QAPPs should be reviewed at least once every five years. If no changes are necessary, the agency is required to resubmit the existing QAPP stating that it has been reviewed and no changes were required.

Response: Will review and update QAPPs as described above.

Last EPA Reviewer: rguillot - 18:18:03 on 02/10/17 - rguillot - rguillot

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

11. For all new pollutants to be monitored and methods to be used during the fiscal year, submit a revised quality assurance project plan three months prior to collection of environmental data.

Response: Will revise QAPPs as described above.

Last EPA Reviewer: rguillot - 18:18:06 on 02/10/17 - rguillot - rguillot

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

12. Review and update quality assurance procedures, if needed, to reflect current/revised Federal quality assurance requirements. Local agencies will coordinate Standard Operating Procedures (SOP) changes through the State. If changes or revisions are anticipated, submit the following

information electronically to [r4sesdairqa@epa.gov](mailto:r4sesdairqa@epa.gov) or in hard copy to EPA Region 4's Science and Ecosystems Support Division (SESD), Superfund and Air Section, 980 College Station Road, Athens, Georgia 30605.

- A. Revisions to current SOPs as they are completed, and
- B. SOPs for new monitoring and ancillary equipment used in the SLAMS network six months after equipment is installed.

Response: Will review and update quality assurance procedures as described above.

Last EPA Reviewer: rguillot - 18:18:11 on 02/10/17 - rguillot - rguillot

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

13. For all SLAMS and Special Purpose Monitors (SPMs) meeting the requirements of 40 CFR 58, notify EPA as soon as possible, but no later than 30 days, after the determination of exceedances/violations of the NAAQS for all criteria pollutants, including PM<sub>2.5</sub>. For the 8 hour ozone NAAQS, report all 4th maximum concentrations that are at or above the level of the standard (agencies meet this commitment for monitors whose data are reported to AIRNow).

Response: Will meet requirements as described above.

Last EPA Reviewer: swaterso - 13:01:37 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

14. Comply with the requirements in 40 CFR Section 50.14 regarding treatment of data influenced by exceptional events. (Note: EPA Region 4 will neither review nor concur on either State or Local requests to exclude data unless the State is in compliance with the appropriate requirements.)

Response: Will comply as described above.

Last EPA Reviewer: swaterso - 13:01:46 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

15. In conjunction with the AQI, agencies are encouraged to submit an Air Quality Forecast for MSA's greater than 350,000 people to the EPA AIRNow Web site. The air quality forecast should be submitted daily to the AIRNow Web site before 3:55 p.m. EDT. The Air Quality Forecast, like the AQI, will be based on the primary criteria pollutant. Unlike the AQI, an index value is not required to be reported as a forecast; instead of the index value, the AQI descriptor value of Good, Moderate, Unhealthy for Sensitive Groups, Unhealthy, or Very Unhealthy should be used.

Response: Will forecast as described above.

Last EPA Reviewer: swaterso - 13:02:11 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

16. Support staff participation at the following meetings:
- A. The Region 4 Ambient Air Monitoring Work Shop; and
  - B. The National Ambient Air Monitoring Conference.

Response: Will support staff participation in the conferences.

Last EPA Reviewer: swaterso - 13:02:18 on 01/30/17 - swaterso - swaterso

Negotiation Status: Status\_OK



Negotiation Comments:Mid Year Status: Status\_OKMid Year Comments:Current Status: Status\_OKRegional Staff Response:

17. SLAMS data for each criteria pollutant monitor must be at a minimum 75% complete on a quarterly and annual basis. Additionally, ozone data must be 90% or more complete on a three year average basis. Notify EPA immediately if a problem arises that will prevent the agency from meeting a data completeness requirement for any pollutant. Provide reasons why the data completeness requirement will not be met, a schedule for correcting the problem, and corrective actions that will be taken to avert the problem from recurring. Notify EPA by mail or e-mail no more than 45 days after the end of the quarter of any monitor not meeting the 75% data recovery requirement. Data recovery may become part of a regional/national statistical report published by EPA.

Response: Will meet the requirements as described above.Last EPA Reviewer: swaterso - 13:02:25 on 01/30/17 - swaterso - swatersoNegotiation Status: Status\_OKNegotiation Comments:Mid Year Status: Status\_OKMid Year Comments:Current Status: Status\_OKRegional Staff Response:

## Reduce Air Toxics\*

### Goal: 1: Addressing Climate Change and Improving Air Quality

**Objective: 1.2: Improve Air Quality.** Achieve and maintain health- and welfare-based air pollution standards and reduce risk from toxic air pollutants and indoor air contaminants.

#### Sub-Objective: Reduce Air Toxics

**Strategic Targets:**

- Through 2018, maintain air toxics (toxicity-weighted for cancer) emissions reductions to 4.2 million tons from the 1993 toxicity-weighted baseline of 7.2 million tons.
- 

\* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

---

**FY 2016 105 Grant Commitments:**

1. Collect ambient air quality data for toxics from monitoring sites as appropriate for special studies funded under this agreement. Include any planned air toxics monitoring in the ambient monitoring network design plan that is submitted to EPA in July annually. If no monitoring is planned, respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: Currently a PAH study is due to be funded by EPA during this fiscal year. If the funds are secured there is a possibility that air toxics monitoring could occur during FY 2016. If monitoring does occur the monitoring sites will be noted as described above.

Last EPA Reviewer: swaterso - 13:03:18 on 01/30/17 - swaterso - dpalmer

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments: Monitoring has currently not begun for the PAH study and the network plan was submitted to EPA on July 1, 2016. Memphis-Shelby County will include information in the 2017 network plan

Current Status: Status\_OK

Regional Staff Response:

2. Ensure that the QA/QC procedures for air toxics monitoring and lab analysis, including necessary quality assurance project plans (QAPPs) and standard operating procedures (SOPs), are submitted (in hardcopy and electronic format) to the Region 4 Quality Assurance Coordinator and the Technical Project Officer for review, approval, and inclusion into the agency's quality management plan (QMP). If no monitoring is planned respond to this commitment by stating, "No air toxics monitoring will be performed."

Response: QA/QC will be followed as described above.

Last EPA Reviewer: swaterso - 13:03:32 on 01/30/17 - swaterso - dpalmer

Negotiation Status: Status\_OK

NegotiationComments:

Mid Year Status: Status\_OK

Mid Year Comments: The workplan states the study will have an approved QAPP prior to samples being collected. Sample collection has not begun at this point.

Current Status: Status\_OK

Regional StaffResponse:

3. If applicable, encourage laboratories conducting analyses for air toxics to participate in any available national or regional inter-laboratory proficiency testing programs and audits and make identified modifications to enhance data quality.

Response: Will encourage labs as described above.

Last EPA Reviewer: swaterso - 13:03:46 on 01/30/17 - swaterso - dpalmer

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

4. If applicable, enter quality assured and associated QA/QC data into the AQS database system no later than 120 days from the end of the quarter for all ambient air toxics monitoring data collected.

Response: Will enter quality assured data as described above.

Last EPA Reviewer: swaterso - 13:03:57 on 01/30/17 - swaterso - dpalmer

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments: Data collection has not yet begun. As part of the study data will be released to the public. The data will be uploaded to AQS at that time.

Current Status: Status\_OK

Regional StaffResponse:

5. Assume delegation and implementation of all promulgated Clean Air Act Section 112, 111, and 129 rules and standards [National Emission Standard for Hazardous Air Pollutant (NESHAP), and New Source Performance Standards (NSPS)] within 9 to 12 months of EPA's promulgation, as appropriate, if a rulemaking is required to take delegation via the Agency's CAA Title V approval process. Notify Region 4 by submitting rule adoption documentation within 60 days of adoption.

Response: Will assume rules and standards as described above.

Last EPA Reviewer: lpage - 11:02:51 on 02/07/17 - lpage - lpage

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

6. Work towards establishing the programmatic expertise to address the risk-based components of Clean Air Act sections 112, 111, and 129, by pursuing risk training when appropriate.

Response: Will work toward training as described above.

Last EPA Reviewer: lpage - 11:02:58 on 02/07/17 - lpage - lpage

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

7. Make case-by-case MACT determinations for all applicable sources under CAA, section 112(g) including appropriate compliance monitoring measures, and copy EPA Region 4 on all final 112 (g) determinations.

Response: Will make case-by-case MACT determinations as required.

Last EPA Reviewer: lpage - 11:03:02 on 02/07/17 - lpage - lpage

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

8. Maintain a record of all approved alternatives to monitoring, testing, recordkeeping, and reporting requirements made for sources subject to MACT standards and report number of requests processed semi-annually (this is required by rule; see 40 CFR Part 63.91(g)(1)(ii)).

Response: Will maintain a records and report as described above.

Last EPA Reviewer: lpage - 11:03:09 on 02/07/17 - lpage - lpage

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

9. Prepare and submit CAA sections 111(d) and 129 state plans and letters of certification in accordance with regulatory timeframes. In addition, collect and submit reports on progress of sections 111(d) and 129 plans annually, pursuant to 40 CFR 60.25(e) and (f).

Response: Will prepare and submit plans as described above.

Last EPA Reviewer: jdressle - 17:09:29 on 02/15/17 - trusso - skukier

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments: Status ok

Current Status: Status\_OK

Regional Staff Response:

## Monitoring and Enforcement\*

### **Goal: 5: Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance**

**Objective: 5.1: Enforce Environmental Laws to Achieve Compliance.** Pursue vigorous civil and criminal enforcement that targets the most serious water, air, and chemical hazards in communities to achieve compliance. Assure strong, consistent, and effective enforcement of federal environmental laws nationwide. Use Next Generation Compliance strategies and tools to improve compliance and reduce pollution.

### **Sub-Objective: Support Addressing Climate Change and Improving Air Quality**

**Strategic Targets:**

- By 2018, reduce, treat, or eliminate 1,590 million estimated pounds of air pollutants as a result of concluded enforcement actions (5-year cumulative). (FY 2005-2008 baseline: 480 million pounds, annual average over the period. Status for FY 2013: 610 million pounds.)
- 

\* Information from EPA's 2014-2018 Strategic Plan at (<http://www2.epa.gov/planandbudget/strategicplan>).

---

### **FY 2016 105 Grant Commitments:**

1. Ensure enforcement and compliance monitoring is consistent with the Compliance Monitoring Strategy Policy revised and reissued on July 14, 2014, The Timely and Appropriate Enforcement Response to High Priority Violations Policy revised and reissued on August 25, 2014. Ensure complete, accurate and timely data support of the Integrated Compliance Information System (ICIS-Air).

Response: Will ensure enforcement and compliance as described above.

Last EPA Reviewer: cgala - 15:57:05 on 02/15/17 - cgala - cgala

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

2. Resolve violations of any rule for which EPA has delegated authority to the state or local agency. Federally Reportable Violations should be reported to ICIS-Air in accordance with the Guidance on Federally-Reportable Violations for Clean Air Act Stationary Sources revised and reissued on September 23, 2014.

Response: Will resolve violations as described above.

Last EPA Reviewer: cgala - 15:57:13 on 02/15/17 - cgala - cgala

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

3. Inspect 25% of all NESHAP asbestos demolition/renovation projects. These projects should be selected so that all removal contractors are inspected at least once. Alternatively, lower inspection rates can be negotiated if an effective contractor certification program is in place. Lower inspection rates can also be negotiated if a non-notifier strategy is developed and implemented.

Response: Will meet or exceed inspection of NESHAP asbestos projects as described above.

Last EPA Reviewer: pmcilvai - 09:05:41 on 02/13/17 - pmcilvai - pmcilvai

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

4. Observe asbestos work practices in progress whenever possible to assess compliance. Special priority will be given to entering a project of a contractor with a work practice violation within the previous 12-month period.

Response: Will observe work practices as described above.

Last EPA Reviewer: pmcilvai - 09:05:50 on 02/13/17 - pmcilvai - pmcilvai

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

5. ACTS/NARS database is no longer available. Report the following asbestos NESHAP activities at least forty-five (45) days after each fiscal **six-month period** 1) number of notifications received; 2) number of inspections; 3) non-notifier activity if applicable; 4) number of non-penalty enforcement actions; 5) number of enforcement actions with an assessed penalty; and 6) total penalty assessment.

Response: Will report as described above.

Last EPA Reviewer: pmcilvai - 09:06:12 on 02/13/17 - pmcilvai - pmcilvai

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

6. Maintain a State/Local health and safety plan for asbestos demolition/renovation inspectors. Plan to include medical monitoring, protective equipment, and training as minimum requirements. Alternatively, implement EPA's "Health and Safety Guidelines for EPA Asbestos Inspectors," dated March 1991. These documents will be reviewed by EPA during state program visits.

Response: Will maintain health and safety plans as described above.

Last EPA Reviewer: pmcilvai - 09:06:22 on 02/13/17 - pmcilvai - pmcilvai

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK



Regional Staff Response:

7. Recommend (where appropriate) cases and provide support to the EPA Criminal Enforcement Program.

Response: Yes.

Last EPA Reviewer: cgala - 15:57:28 on 02/15/17 - cgala - cgala

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

## Cross Cutting Issues

**Goal: 1 and 5: Addressing Climate Change and Improving Air Quality, and Protecting Human Health and the Environment by Enforcing Laws and Assuring Compliance**

**Objective:** See all objectives listed in this agreement.

**Sub-Objective:** See all strategic targets listed in this agreement.

**Strategic Targets:** • See all strategic targets listed in this agreement.

---

### FY 2016 105 Grant Commitments:

#### Emission Inventories - Hazardous Air Pollutants

1. Review 2011 National Air Toxic Assessment (NATA) results during FY 15 and make revisions to your agency's inventory. Support the Emission Inventory System (EIS) in reporting the 2014 National Emissions Inventory (NEI) for hazardous air pollutants. The EPA requests that state, local, and tribal air agencies submit emissions information updates for major point sources to EIS database annually or as requested by the EPA Office of Air Quality Planning and Standards. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. The state and local contact in the Air Data and Analysis Section should be notified via e-mail when the 2014 submittal is made to EPA.

Response: Yes.

Last EPA Reviewer: elouis - 11:38:26 on 03/07/17 - elouis - elouis

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **Emission Inventories - Criteria Air Pollutants**

2. Develop and submit to EPA, emissions inventory information for all applicable point sources, CAP pollutants and time frames consistent with the Air Emissions Reporting Requirements (AERR) Rule published in the December 17, 2008; 73 Federal Register 76539 and any clarifying or updated policy. The 2014 CAPs point source emissions inventories should be submitted to EPA Headquarters through the Emissions Inventory System (EIS) Gateway no later than January 15, 2016. Early submittals are recommended. Information on the EIS Gateway can be found at: <http://www.epa.gov/ttn/chief/eis/gateway/index.html>. Notify the state and local NEI/NATA contact in the Air Data and Analysis Section via email when the 2014 submittal is made to the EIS.

Response: Yes.

Last EPA Reviewer: elouis - 10:20:32 on 02/01/17 - elouis - elouis

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

### **Planning**

3. Submit a draft Air Planning Agreement for FY 2016 by August 1, 2015, respectively, by responding to the commitments on the internet-based draft workplan.

Response: Yes.

Last EPA Reviewer: ggraf - 09:05:24 on 01/26/17 - ggraf - ggraf

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments:

Current Status: Status\_OK

Regional Staff Response:

4. Participate with EPA in an end of year evaluation of performance to be completed by February 15, 2017. This evaluation will be based on an annual summary report submitted by the agency by December 31, and on progress reports received throughout the year. In accordance with 40 CFR 35.115 and the EPA Policy on Managing Unliquidated Obligations and Ensuring Progress under EPA Assistance Agreements, the joint evaluation process will include:
- A. discussions of accomplishments as measured against work plan commitments;
  - B. discussions of the cumulative effectiveness of the work performed under all work plan components;
  - C. discussions of existing and potential problem areas;
  - D. suggestions for improvement, including, where feasible, schedules for making improvements; and
  - E. discussions of how effectively grant funds were managed and utilized, taking into account any accumulation of unliquidated obligations.

Response: Yes.

Last EPA Reviewer: ggraf - 14:12:16 on 02/14/17 - ggraf - ggraf

Negotiation Status: Status\_OK

Negotiation Comments:

Mid Year Status: Status\_OK

Mid Year Comments: Annual Summary Report received 12/11/16.

Current Status: Status\_OK

Regional Staff Response:

#### **Agency Expectations of EPA (optional)**

5. Enter Agency's expectations of EPA (i.e., assistance needed from EPA to meet the commitments under this Air Planning Agreement).

Response: Provide funding and support as needed. Specifically providing training opportunities.

Last EPA Review: - - -

Negotiation Status:

Negotiation Comments:

Mid Year Status:

Mid Year Comments:

Current Status:

Regional Staff Response: